

From: [Granger, Michelle](#)
To: [Hauber, Erin M CIV USARMY CENWK \(USA\)](#)
Subject: RE: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site
Date: Thursday, November 14, 2019 12:13:00 PM
Attachments: [image002.png](#)

Great! Thank you!
Best,
Michelle-

From: Hauber, Erin M CIV USARMY CENWK (USA) <Erin.M.Hauber@usace.army.mil>
Sent: Thursday, November 14, 2019 7:56 AM
To: Granger, Michelle <Granger.Michelle@epa.gov>
Subject: RE: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site

Hi Michelle,

I reviewed the kickoff agenda and the responses to Addendum 1 transmitted last night. I don't have any additional topics to add. The responses to RAWP Addendum 1 comments address our requests. Traditionally you collect soil samples from the centroid of the heaters, the coolest location. The proposed borings are not exactly centered, but we can clarify that during our meeting on Friday. This shouldn't be a surprise.

I should be out of my meetings after lunch in case you need to reach me.

Erin



From: Bruce Scott Kennington (<mailto:bkennington@ramboll.com>)
Sent: Wednesday, November 13, 2019 9:49 PM
To: Granger, Michelle <Granger.Michelle@epa.gov>
Cc: Hauber, Erin M CIV USARMY CENWK (USA) <Erin.M.Hauber@usace.army.mil>; Brink, Bradley J CIV USARMY CENWK (US) <Bradley.J.Brink@usace.army.mil>; Mumford, Fred <fred.mumford@dep.nj.gov>; Stonestreet, Wendy E CIV USARMY CENWK (USA) <Wendy.E.Stonestreet@usace.army.mil>; Gajdek, Richard E CIV USARMY CENAN (USA) <Rich.E.Gajdek@usace.army.mil>; Nejand, Patrick C CIV USARMY CENAN (USA) <Patrick.C.Nejand@usace.army.mil>; Kolb, Neal F CIV USARMY CENAN (USA) <Neal.F.Kolb@usace.army.mil>; Hidalgo, Luis (G&I) <Luis.Hidalgo@riotinto.com>; Gorm Heron (GHeron@thermalrs.com) <GHeron@thermalrs.com>; Chris Thomas (cthomas@thermalrs.com) <cthomas@thermalrs.com>; Scott Tarmann <starmann@ramboll.com>; 'Frances M. Zizila (zizila.frances@epa.gov)' <zizila.frances@epa.gov>
Subject: [Non-DoD Source] RE: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site

Dear Michelle:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)¹, and Luis Hidalgo (Project Coordinator for OU3), please see the attached responses to the additional comments provided by USEPA in the below 11/04/2019 e-mail regarding Addendum No. 1 to the Draft Remedial Action Work Plan for Operable Unit (OU)3 at the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site.

We look forward to discussing these responses in our Construction Kick-off Meeting in Washington, NJ scheduled this week on Friday, November 15, 2019.

¹ In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 13-cv-05798) effective March 11, 2015.

Sincerely,
Bruce

Bruce S Kennington
Principal

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From: Granger, Michelle <Granger.Michelle@epa.gov>
Sent: Monday, November 04, 2019 11:26 AM
To: Bruce Scott Kennington <bkennington@ramboll.com>
Subject: RE: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site

Hi, Bruce-

Attached please find USEPA comments/Informational Requests on Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site. Approval of Addendum No. 1 is subject to addressing the attached comments in Addendum #2 to the RAWP.

I'm looking into availability for the kick-off meeting for the week of Nov. 11th to 15th. It is looking like Friday, Nov. 15th could work for the kick-off meeting. I'll keep you posted.

Thank you!
Best,
Michelle-

From: Bruce Scott Kennington <bkennington@ramboll.com>
Sent: Thursday, October 31, 2019 1:52 PM
To: Granger, Michelle <Granger.Michelle@epa.gov>
Subject: RE: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site

That's good news, Michelle. Thanks to your and the USAVE representatives for a quick turn-around.

We are hard at work to complete Addendum No. 2 to the RAWP to get to you as soon as we can (targeted submittal is by Nov 13, if not sooner). Again, this Addendum No. 2 will include the revised drawings of the surface components of the extracted vapor treatment system and a revised OM&M Plan for the ISTR system. Construction of these items would not take place until well into the 1st quarter 2020.

Understanding that USEPA's approval is pending, but in the spirit of planning ahead, we are interested in your thoughts on holding a kick-off meeting as early as the week of Nov 11 to 15, to enable commencement of drilling inside the Albéa building the week of Nov 18 to 22). This will let us get started before the break for the Thanksgiving holiday. Otherwise commencement of drilling would be delayed to the 1st week in December.

Sincerely,
Bruce

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From: Granger, Michelle <Granger.Michelle@epa.gov>
Sent: Thursday, October 31, 2019 12:33 PM
To: Bruce Scott Kennington <bkennington@ramboll.com>
Subject: RE: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site

Hi, Bruce-

It looks like a technical call will not be necessary. We are wrapping up our review today. I will be sending you an email either tomorrow or Monday with a few of minor concerns.

Thank you!
Best,
Michelle-

From: Bruce Scott Kennington <bkennington@ramboll.com>
Sent: Thursday, October 31, 2019 10:25 AM
To: Granger, Michelle <Granger.Michelle@epa.gov>
Subject: Re: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site

Understood. Thank you, Michelle.

From: Granger, Michelle <Granger.Michelle@epa.gov>
Sent: Thursday, October 31, 2019 7:27:56 AM
To: Bruce Scott Kennington <bkennington@ramboll.com>
Subject: RE: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site

Hi, Bruce-

Thank you for your email. We are currently reviewing the Addendum. I'll touch base later today in case scheduling a call is necessary. Thank you!

Best,
Michelle-

From: Bruce Scott Kennington <bskennington@ramboll.com>
Sent: Wednesday, October 30, 2019 12:45 PM
To: Granger, Michelle <Granger.Michelle@epa.gov>
Subject: RE: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site

Hi, Michelle.

Checking in to see if there are any questions or feedback on last week's submittal of Addendum No. 1 to the RAWP for OU3. We certainly would look forward to a technical call if this would help to quickly answer questions.

Kind regards,
Bruce

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From: Bruce Scott Kennington
Sent: Thursday, October 24, 2019 8:21 PM
To: Granger, Michelle <Granger.Michelle@epa.gov>
Cc: Hauber, Erin M CIV USARMY CENWK (US) <Erin.M.Hauber@usace.army.mil>; Bradley J. Brink (Bradley.J.Brink@usace.army.mil) <Bradley.J.Brink@usace.army.mil>; Fred Mumford <Fred.Mumford@dep.nj.gov>; Stonestreet, Wendy E CIV USARMY CENWK (USA <Wendy.E.Stonestreet@usace.army.mil>; Richard Gajdek P.E. PMP (Rich.E.Gajdek@usace.army.mil) <Rich.E.Gajdek@usace.army.mil>; 'Patrick C. Nejand (patrick.c.nejand@usace.army.mil)' <patrick.c.nejand@usace.army.mil>; Neal F. Kolb P.E. (Neal.F.Kolb@usace.army.mil) <Neal.F.Kolb@usace.army.mil>; Luis Hidalgo (luis.hidalgo@riotinto.com) <luis.hidalgo@riotinto.com>; Gorm Heron (GHeron@thermalrs.com) <GHeron@thermalrs.com>; Chris Thomas (cthomas@thermalrs.com) <cthomas@thermalrs.com>; Scott Tarmann <starmann@ramboll.com>; 'Frances M. Zizila (zizila.frances@epa.gov)' <zizila.frances@epa.gov>
Subject: Addendum No. 1, Draft RAWP, OU3 RA, PVGCS Site

Dear Michelle:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)¹, and Luis Hidalgo (Project Coordinator for OU3), please see the attached cover letter and transmittal of Addendum No. 1 to the Draft Remedial Action Work Plan for Operable Unit (OU)3 at the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site. Also included in the attached are responses to additional requested clarifications received from the Agency via e-mail dated October 17, 2019.

We look forward to addressing what additional questions as they may arise and transmittal of Addendum No. 2 to the Agency (containing updated drawings for the surface treatment system components and a revised Operations, Maintenance and Monitoring Plan) at the earliest opportunity. Please do not hesitate to contact me with any questions or if you would like to schedule a technical call with us including the technical experts at TRS Group.

¹ In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 13-cv-05798) effective March 11, 2015.

Sincerely,

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From: Granger, Michelle <Granger.Michelle@epa.gov>
Sent: Thursday, October 17, 2019 3:11 PM
To: Bruce Scott Kennington <bskennington@ramboll.com>
Cc: Hauber, Erin M CIV USARMY CENWK (USA) <Erin.M.Hauber@usace.army.mil>
Subject: RE: Pohatcong OU3 - RAWP Addendum and follow-up questions

Hi, Bruce-

Thank you for your responses to EPA's questions. We have reviewed the responses and need further clarification on a few. Please see the attached table. If you have any questions, feel free to reach out to me. Also, please incorporate your clarification/responses into the next submittal (Addendum #1). We look forward to reviewing it.

Thank you!
Michelle-

From: Bruce Scott Kennington <bkennington@ramboll.com>
Sent: Monday, October 14, 2019 6:10 PM
To: Granger, Michelle <Granger.Michelle@epa.gov>
Cc: Hauber, Erin M CIV USARMY CENWK (US) <Erin.M.Hauber@usace.army.mil>; Bradley J. Brink (<Bradley.J.Brink@usace.army.mil>) <Bradley.J.Brink@usace.army.mil>; Stonestreet, Wendy E CIV USARMY CENWK (USA <Wendy.E.Stonestreet@usace.army.mil>; rich.e.gajdek@usace.army.mil>; patrick nejand <patrick.c.nejand@usace.army.mil>; Neal F. Kolb P.E. (<Neal.F.Kolb@usace.army.mil>) <Neal.F.Kolb@usace.army.mil>; Hidalgo, Luis (G&I) <Luis.Hidalgo@riotinto.com>; Gibson, Bradley (G&I <Bradley.Gibson@riotinto.com>; Gorm Heron (<GHeron@thermalrs.com>) <GHeron@thermalrs.com>; Chris Blundy (<cblundy@thermalrs.com>) <cblundy@thermalrs.com>; Chris Thomas (<cthomas@thermalrs.com>) <cthomas@thermalrs.com>; Scott Tarmann <starmann@ramboll.com>
Subject: RE: Pohatcong OU3 - RAWP Addendum and follow-up questions

Dear Michelle:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)¹, and Luis Hidalgo (Project Coordinator for OU1(TCE)), please see the attached responses to questions orally conveyed in last week's Technical Call with USEPA and the representatives of the U.S. Army Corps of Engineers held on Oct 8, 2019, and also the follow-up questions from your below e-mail of Oct 9, 2019, regarding the proposed Addendum to the draft Remedial Action Work Plan for Operable Unit (OU)3 at the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site. Also attached is a proposed, revised draft RD/RA time schedule for OU3 reflecting the changes in drilling schedule and phased heating of the different groups of heaters for this Remedial Action.

We look forward to addressing what additional questions as they may arise and transmittal of Addendum No. 1 to the Agency at the earliest opportunity.

¹ In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 13-cv-05798) effective March 11, 2015.

Sincerely,

Bruce S. Kennington

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-----Original Message-----

From: Granger, Michelle <Granger.Michelle@epa.gov>
Sent: Wednesday, October 09, 2019 1:54 PM
To: Bruce Scott Kennington <bkennington@ramboll.com>
Subject: Pohatcong OU3 - RAWP Addendum and follow-up questions

Hi, Bruce-

Thank you for yesterday's call. Below are follow-up items and questions. Please keep in touch and let me know if you have any questions.

Best,
Michelle-

Follow-up Items from 10/8/19 call with Ramboll and Rio Tinto re: change in thermal vendor and impact to design approach.

- * Please keep USEPA informed of any interim informational submittals, conference calls and the schedule for submittal of the RAWP Addendum to ensure an expedited review.
- * Informational Requests: The FlexHeaterSM heating technology was recently patented by TRS Group. If available, please provide a project example demonstrating successful heating with this newly patented TCH technology.

Considerations for the RAWP Addendum:

- USEPA's primary concerns with the change in the heating and contaminant recovery strategy are:
 - o Removal of the previously proposed vapor recovery infrastructure co-located with each heater can and screened across the full length of thermal treatment zone and replacement with a passive venting system (i.e., a 2-inch, sand filled annulus around each heater can) which includes a short vapor extraction screen or chimney above the thermal treatment zone
 - o The level of effort associated with collecting soil confirmation samples
- The following RD appendices require updates:
 - * Appendix B: Thermal Model Simulation Report (or Energy/Mass Balance equivalent)
 - * Appendix D: Design Drawings
 - * Appendix H: OM&M (including vendor safety plan and treatment system sampling)

- * The following RAWP appendices require updates:
 - * Appendix B: CQAP (some of the checklists)
 - * Appendix H: Contingency Plan – please include discussion of hazard analysis associated with drilling adjacent to active heating zone. Can drilling adjacent to an active heating zone, e.g., Group A, be performed as soon as practical in the drilling sequence to reduce the possibility of intercepting steam?
- * Wellfield layout changes (interim deliverable?):
 - * Will the treatment zone or the heated zone change from what was presented in the 100% RD?
 - * Will the spacing of the heaters change?
 - * Will the temperature of the heaters be monitored in situ?
- * Will there be any changes to the indoor air monitoring program?
- * Operational Duration:
 - * What is the estimated operational duration for the three stages, Groups A, B, and C?
 - * Has the amount of energy estimated to be required to reach treatment objectives changed?
 - * Is the estimated power input rate (W/m) associated with the FlexHeaterSM similar to the previous design?